

POMERANTZ LLP

Jennifer Pafiti (SBN 282790)
1100 Glendon Avenue, 15th Floor
Los Angeles, California 90024
Telephone: (310) 405-7190
Email: jpafiti@pomlaw.com

Louis C. Ludwig (admitted *pro hac vice*)
Jared Schneider (admitted *pro hac vice*)
Ten South LaSalle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Facsimile: (312) 229-8811
Email: lludwig@pomlaw.com
Email: jschneider@pomlaw.com

Co-Counsel for Co-Lead Plaintiffs

[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER VATAJ, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

WILLIAM D. JOHNSON, JOHN R. SIMON,
GEISHA WILLIAMS, and JASON P.
WELLS,

Defendants.

Case No. 4:19-cv-06996-HSG

**STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING THE
SCHEDULE FOR THE FILING OF
AN AMENDED COMPLAINT AND
RESPONSE THERETO**

CLASS ACTION

WHEREAS, on October 25, 2019, Plaintiff Christopher Vataj (“Vataj”), individually and on behalf of all others similarly situated, filed a putative class action complaint on behalf of investors in PG&E Corporation against defendants William D. Johnson, John R. Simon, Geisha

Williams, and Jason P. Wells (collectively, “Defendants”) alleging violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (“Exchange Act”), 15 U.S.C. §§ 78j(b) and 78t(a), and Securities and Exchange Commission (“SEC”) Rule 10b-5 promulgated thereunder, 17 C.F.R. § 240.10b-5 (the “Complaint”) (Dkt. No. 1);

WHEREAS, on February 3, 2020, the Court entered an order appointing Iron Workers Local 580 Joint Funds and Ironworkers Locals 40, 361 & 417 Union Security Funds (the “Iron Workers Funds”) and Robert Allustiarti (“Allustiarti”) as Co-Lead Plaintiffs and their counsel as Co-Lead Counsel pursuant to Section 21D of the Securities Exchange Act, 15 U.S.C. § 78u-4 (Dkt. N. 48);

WHEREAS, on February 20, 2020, the Court entered the Scheduling Order (Dkt. No. 54) which provided the schedule for the filing of an amended complaint and response thereto; and

WHEREAS, the outbreak of COVID-19 has affected Co-Lead Plaintiffs’ investigation for their amended complaint and additional time is needed to amend the pleading;

IT IS HEREBY STIPULATED, that subject to the Court’s approval:

1. The deadline for Co-Lead Plaintiffs to file an amended complaint is continued from April 3, 2020 to April 17, 2020.

2. The deadline for Defendants to answer or otherwise respond to the amended complaint is continued from May 1, 2020 to May 15, 2020.

3. The deadline for Co-Lead Plaintiffs to file an opposition to any motions to dismiss Defendants file is continued from May 29, 2020 to June 12, 2020.

4. The deadline for Defendants to file a reply in support of any motions to dismiss is continued from June 19, 2020 to July 3, 2020.

1 Dated: March 26, 2020

Respectfully submitted,

2 **POMERANTZ LLP**

3 /s/Louis C. Ludwig

4 Louis C. Ludwig
5 (admitted pro hac vice)
6 Jared Schneider
(admitted pro hac vice)

7 Ten South LaSalle Street, Suite 3505
8 Chicago, Illinois 60603
9 Telephone: (312) 377-1181
10 Facsimile: (312) 229-8811
Email: lludwig@pomlaw.com
Email: jschneider@pomlaw.com

11 Jeremy A. Lieberman
12 (admitted pro hac vice)
13 J. Alexander Hood II
14 (admitted pro hac vice)
15 600 Third Avenue, 20th Floor
16 New York, NY 10016
17 Telephone: (212) 661-1100
18 Facsimile: (212) 661-8665
19 Email: jalieberman@pomlaw.com
20 Email: ahood@pomlaw.com

21 Jennifer Pafiti (SBN 282790)
22 1100 Glendon Avenue, 15th Floor
23 Los Angeles, California 90024
24 Telephone: (310) 405-7190
25 Email: jpafiti@pomlaw.com

26 Dated: March 26, 2020

THE ROSEN LAW FIRM, P.A.

27 /s/Laurence M. Rosen

28 Laurence M. Rosen (SBN 219683)
355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071
Telephone: (213) 785-2610
Facsimile: (213) 226-4684
Email: lrosen@rosenlegal.com

Jonathan Horne (*pro hac vice*)
275 Madison Avenue, 40th Floor
New York, NY 10016
Telephone: (212) 686-1060
Facsimile: (212) 202-3827
Email: jhorne@rosenlegal.com

Co-Counsel for Co-Lead Plaintiffs

THE SCHALL LAW FIRM

Brian Schall
Sherin Mahdavian
Rina Restaino, Esq.
1880 Century Park East, Suite 404
Los Angeles, CA 90067
Telephone: (424) 303-1964
Email: brian@schallfirm.com
sherin@schallfirm.com
rina@schallfirm.com

Additional Counsel for Plaintiff Allustiarti

Dated: March 26, 2020

MCDERMOTT WILL & EMERY LLP

/s/Steven S. Scholes
Steven S. Scholes (*admitted pro hac vice*)
444 West Lake Street, Suite 4000
Chicago, IL 60606
Telephone: (312) 984-7762
Email: sscholes@mwe.com

Michael A. Piazza (SBN 235881)
Gregory R. Jones (SBN 229858)
Jason Strabo (SBN 246426)
2049 Century Park East, Suite 3200
Los Angeles, CA 90067-3218
Telephone: (310) 277-4110
Facsimile: (310) 277-4730
Email: PG&E@mwe.com

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 3/26/2020


HONORABLE HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT COURT JUDGE